

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re)	Chapter 15
)	
Crédito Real, S.A.B. de C.V., SOFOM, E.N.R., ¹)	Case No. 22-10630 (JTD)
)	
Debtor in a Foreign Proceeding.)	
)	
In re:)	Chapter 11
)	
Credito Real, S.A.B. de C.V., SOFOM, E.N.R.)	Involuntary Case No. 22-10696 (JTD)
)	
Putative Debtor.)	
)	

**NOTICE OF AMENDED² AGENDA OF MATTERS SCHEDULED FOR
HEARING ON OCTOBER 11, 2022 AT 9:30 A.M. (ET)**

***THE MATTERS SCHEDULED FOR THIS HEARING HAVE BEEN CONTINUED
TO A DATE TO BE DETERMINED. THE HEARING HAS BEEN CANCELLED
WITH PERMISSION FROM THE COURT.***

I. CONTINUED MATTERS:

1. Verified Petition for Recognition of Foreign Main Proceeding [[Chpt 15 Docket No. 2](#) – filed July 14, 2022]

Objection / Response Deadline: August 26, 2022 at 4:00 p.m. (ET)

Objections / Responses Received:

- A. Letter from Stanislav Bozhenko [[Chpt 15 Docket No. 41](#) – filed August 22, 2022]
- B. Objection of the Ad Hoc Group to the (I) Verified Petition for Recognition of Foreign Main Proceeding and (II) Motion of the Putative Debtor to Dismiss the Involuntary Chapter 11 Petition [[Chpt 15 Docket No. 44](#) – filed August 26, 2022]

¹ The last four identifying digits of the tax number and the jurisdiction in which the Chapter 15 Debtor pays taxes is Mexico – 6815. The Chapter 15 Debtor's corporate headquarters is located at Avenida Insurgentes Sur No. 730, 20th Floor, Colonia del Valle Norte, Alcaldía Benito Juárez, 03103, Mexico City, Mexico.

² Amended items appear in bold.

- C. Declaration of Alejandro Sainz in Support of the Objection of the Ad Hoc Group to the (I) Verified Petition for Recognition of Foreign Main Proceeding and (II) Motion of the Putative Debtor to Dismiss the Involuntary Chapter 11 Petition [[Chpt 15 Docket No. 45](#) – filed August 26, 2022]
- D. Declaration of Jorge Villen in Support of Objection of the Ad Hoc Group to the (I) Verified Petition for Recognition of Foreign Main Proceeding and (II) Motion of the Putative Debtor to Dismiss the Involuntary Chapter 11 Petition [[Chpt 15 Docket No. 46](#) – filed August 26, 2022]
- E. Declaration of Luis Manuel Camp Méjan Carrer [[Chpt 15 Docket No. 47](#) – filed August 26, 2022]
- F. Supplemental Declaration of Kenneth J. Monaghan on Behalf of Institutional Multiple Investment Fund LLC [[Chpt 15 Docket No. 48](#) – filed August 26, 2022]
- G. Declaration of Daniel Alejandro Díaz Alvarez in Support of Objection of the Ad Hoc Group to the (I) Verified Petition for Recognition of Foreign Main Proceeding and (II) Motion of the Putative Debtor to Dismiss the Involuntary Chapter 11 Petition [[Chpt 15 Docket No. 65](#) – filed September 17, 2022]
- H. **Letter from Alejandro Lelo de Larrea [[Chpt. 15 Docket No. 85](#) – filed October 6, 2022]**

Related Documents:

- i. Chapter 15 Petition for Recognition of Foreign Proceeding [[Chpt 15 Docket No. 1](#) – filed July 14, 2022]
- ii. Declaration of Juan Pablo Estrada Michel Pursuant to 28 U.S.C. § 1746 [[Chpt 15 Docket No. 3](#) – filed July 14, 2022]
- iii. Notice of Filing and Hearing on Petition Under Chapter 15 of the United States Bankruptcy Code and Motion for Related Relief [[Chpt 15 Docket No. 40](#) – filed August 12, 2022]
- iv. Statement Notifying the Court of Developments in the Mexican Liquidation Proceeding Pursuant to 11 U.S.C. § 1518 and 28 U.S.C. § 1746 [[Chpt 15 Docket No. 42](#) – filed August 25, 2022]
- v. Supplemental Declaration of Juan Pablo Estrada Michel [[Chpt 15 Docket No. 43](#) – filed August 25, 2022]

- vi. Statement Notifying the Court of the Developments in the Mexican Liquidation Proceeding Pursuant to 11 U.S.C. § 1518 and 28 U.S.C. § 1746 [[Chpt 15 Docket No. 53](#) – filed September 14, 2022]
- vii. Notice of Filing of a Certified Translation of the Moreno Appeal [[Chpt 15 Docket No. 54](#) – filed September 14, 2022]
- viii. Reply in Support of (I) Verified Petition for Recognition of Foreign Main Proceeding and (II) Motion to Dismiss the Involuntary Chapter 11 Petition [[Chpt 15 Docket No. 55](#) – filed September 14, 2022]
- ix. Third Declaration of Juan Pablo Estrada Michel Pursuant to Pursuant to 28 U.S.C. § 1746 [[Chpt 15 Docket No. 57](#) – filed September 14, 2022]
- x. Declaración de José Ramón Cossío Díaz Para Sustentar a La Petición Conforme al Capítulo 15 y La Solicitud Para Desestimar [[Chpt 15 Docket No. 58](#) – filed September 14, 2022]
- xi. Order Granting Motion for Leave to Exceed the Page Limitation with Respect to the Reply in Support of (I) Verified Petition for Recognition of Foreign Main Proceeding and (II) Motion to Dismiss the Involuntary Chapter 11 Petition [[Chpt 15 Docket No. 59](#); entered September 14, 2022]
- xii. Notice of Hearing [[Chpt 15 Docket No. 71](#) – filed September 21, 2022]
- xiii. Fourth Declaration of Juan Pablo Estrada Michel Pursuant to 28 U.S.C. § 1746 [[Chpt. 15 Docket No. 77](#) – filed September 23, 2022]

Witness Information:

- a. The Foreign Representative / Putative Debtor may offer the testimony by declaration of Robert Wagstaff, Managing Director at Riveron Consulting, LLC.
- b. The Foreign Representative / Putative Debtor may offer the testimony by declaration or live testimony of Juan Pablo Estrada Michel, founding partner of López Melih y Estrada, S.C.
- c. The Foreign Representative / Putative Debtor may offer the testimony by declaration or live testimony of José Ramón Cossío Díaz, associate research-professor at El Colegio de Mexico.
- d. The Ad Hoc Group / Petitioning Creditors may offer the testimony by declaration or live testimony of Alejandro Sainz, founding partner of Sainz Abogados, S.C.

- e. The Ad Hoc Group / Petitioning Creditors may offer the testimony by declaration or live testimony of Luis Manuel Camp Méjan Carrer, professor at the Autonomous Technological Institute of Mexico.
- f. The Ad Hoc Group / Petitioning Creditors may offer the testimony by declaration of Kenneth J. Monaghan, managing director of Amundi Asset Management US, Inc.
- g. The Ad Hoc Group / Petitioning Creditors may offer the testimony by declaration of Jorge Villen, Director at Houlihan Lokey Capital, Inc.
- h. The Ad Hoc Group / Petitioning Creditors may offer the testimony by declaration or live testimony of Daniel Alejandro Díaz Alvarez, founding partner of Sainz Abogados, S.C.

Status: The hearing on this matter has been continued to a date to be determined.

- 2. Motion of the Putative Debtor to Dismiss the Involuntary Chapter 11 Petition [[Chpt 11 Docket No. 5](#) – filed July 14, 2022]

Objection / Response Deadline: August 26, 2022 at 4:00 p.m. (ET)

Objections / Responses Received:

- A. Objection of the Ad Hoc Group to the (I) Verified Petition for Recognition of Foreign Main Proceeding and (II) Motion of the Putative Debtor to Dismiss the Involuntary Chapter 11 Petition [[Chpt 11 Docket No. 55](#) – filed August 26, 2022]
- B. Declaration of Alejandro Sainz in Support of the Objection of the Ad Hoc Group to the (I) Verified Petition for Recognition of Foreign Main Proceeding and (II) Motion of the Putative Debtor to Dismiss the Involuntary Chapter 11 Petition [[Chpt 11 Docket No. 56](#) – filed August 26, 2022]
- C. Declaration of Jorge Villen in Support of Objection of the Ad Hoc Group to the (I) Verified Petition for Recognition of Foreign Main Proceeding and (II) Motion of the Putative Debtor to Dismiss the Involuntary Chapter 11 Petition [[Chpt 11 Docket No. 57](#) – filed August 26, 2022]
- D. Declaration of Luis Manuel Camp Méjan Carrer [[Chpt 11 Docket No. 58](#) – filed August 26, 2022]
- E. Supplemental Declaration of Kenneth J. Monaghan on Behalf of Institutional Multiple Investment Fund LLC [[Chpt 11 Docket No. 59](#) – filed August 26, 2022]

F. Declaration of Daniel Alejandro Díaz Alvarez in Support of Objection of the Ad Hoc Group to the (I) Verified Petition for Recognition of Foreign Main Proceeding and (II) Motion of the Putative Debtor to Dismiss the Involuntary Chapter 11 Petition [[Chpt 11 Docket No. 72](#) – filed September 17, 2022]

Related Documents:

- i. Involuntary Petition Against a Non-Individual [[Chpt 11 Docket No. 1](#) – filed June 22, 2022]
- ii. Summons to Debtor in Involuntary Case [[Chpt 11 Docket No. 2](#) – filed June 23, 2022]
- iii. Declaration of Robert Wagstaff in Support of (I) Motion of the Putative Debtor to Transfer Venue of the Involuntary Chapter 11 Case to the United States Bankruptcy Court for the District of Delaware and (II) Motion of the Putative Debtor to Dismiss the Involuntary Chapter 11 Petition [[Chpt 11 Docket No. 7](#) – filed July 14, 2022]
- iv. Declaration of Juan Pablo Estrada Michael in Support of (I) Motion of the Putative Debtor to Transfer Venue of the Involuntary Chapter 11 Case to the United States Bankruptcy Court for the District of Delaware and (II) Motion of the Putative Debtor to Dismiss the Involuntary Chapter 11 Petition [[Chpt 11 Docket No. 8](#) – filed July 14, 2022]
- v. Notice of Motion and Hearing [[Chpt 11 Docket No. 51](#) – filed August 12, 2022]
- vi. Reply in Support of (I) Verified Petition for Recognition of Foreign Main Proceeding and (II) Motion to Dismiss the Involuntary Chapter 11 Petition [[Chpt 11 Docket No. 63](#) – filed September 14, 2022]
- vii. Third Declaration of Juan Pablo Estrada Michel Pursuant to Pursuant to 28 U.S.C. § 1746 [[Chpt 11 Docket No. 65](#) – filed September 14, 2022]
- viii. Declaración de José Ramón Cossío Díaz Para Sustentar a La Petición Conforme al Capítulo 15 y La Solicitud Para Desestimar [[Chpt 11 Docket No. 66](#) – filed September 14, 2022]
- ix. Order Granting Motion for Leave to Exceed the Page Limitation with Respect to the Reply in Support of (I) Verified Petition for Recognition of Foreign Main Proceeding and (II) Motion to Dismiss the Involuntary Chapter 11 Petition [[Chpt 11 Docket No. 67](#) – entered September 15, 2022]
- x. Notice of Hearing [[Chpt 11 Docket No. 78](#) – filed September 21, 2022]

xi. Fourth Declaration of Juan Pablo Estrada Michel Pursuant to 28 U.S.C. § 1746 [[Chpt 11 Docket No. 84](#) – filed September 23, 2022]

Witness Information:

- a. The Foreign Representative / Putative Debtor may offer the testimony by declaration of Robert Wagstaff, Managing Director at Riveron Consulting, LLC.
- b. The Foreign Representative / Putative Debtor may offer the testimony by declaration or live testimony of Juan Pablo Estrada Michel, founding partner of López Melih y Estrada, S.C.
- c. The Foreign Representative / Putative Debtor may offer the testimony by declaration or live testimony of José Ramón Cossío Díaz, associate research-professor at El Colegio de Mexico.
- d. The Ad Hoc Group / Petitioning Creditors may offer the testimony by declaration or live testimony of Alejandro Sainz, founding partner of Sainz Abogados, S.C.
- e. The Ad Hoc Group / Petitioning Creditors may offer the testimony by declaration or live testimony of Luis Manuel Camp Méjan Carrer, professor at the Autonomous Technological Institute of Mexico.
- f. The Ad Hoc Group / Petitioning Creditors may offer the testimony by declaration of Kenneth J. Monaghan, managing director of Amundi Asset Management US, Inc.
- g. The Ad Hoc Group / Petitioning Creditors may offer the testimony by declaration of Jorge Villen, Director at Houlihan Lokey Capital, Inc.
- h. The Ad Hoc Group / Petitioning Creditors may offer the testimony by declaration or live testimony of Daniel Alejandro Díaz Alvarez, founding partner of Sainz Abogados, S.C.

Status: The hearing on this matter has been continued to a date to be determined.

Dated: October 7, 2022

Respectfully submitted,

/s/ Amanda R. Steele

RICHARDS, LAYTON & FINGER, P.A.

Mark D. Collins (No. 2981)
John H. Knight (No. 3848)
Paul N. Heath (No. 3704)
Amanda R. Steele (No. 4430)
920 North King Street
Wilmington, DE 19801
Telephone: (302) 651-7700
Facsimile: (302) 651-7701
collins@rlf.com
knight@rlf.com
heath@rlf.com
steele@rlf.com

*Co-Counsel to the Foreign Representative
and the Putative Debtor*

WHITE & CASE LLP

John K. Cunningham (admitted *pro hac vice*)
J. Christopher Shore (admitted *pro hac vice*)
Philip M. Abelson (admitted *pro hac vice*)
1221 Avenue of the Americas
New York, NY 10020
Telephone: (212) 819-8200
jcunningham@whitecase.com
cshore@whitecase.com
philip.abelson@whitecase.com

Richard S. Kebrdle (admitted *pro hac vice*)
Jason N. Zakia (admitted *pro hac vice*)
Jesse Green (admitted *pro hac vice*)
200 South Biscayne Boulevard, Suite 4900
Miami, FL 33131
Telephone: (305) 371-2700
rkebrdle@whitecase.com
jzakia@whitecase.com
jgreen@whitecase.com

*Co-Counsel to the Foreign Representative and the
Putative Debtor*